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June 26, 2025

VIA ECF

The Honorable Analisa Torres
United States District Judge
U.S. District Court for the Southern District of New York
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New York, New York 10007

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Re: *Brawer, et al. v. Egan-Jones Ratings Co., et al.*,
Case No. 24-cv-1895 (AT)

Dear Judge Torres:

Pursuant to Your Honor's Individual Practice Rule I(C), Defendants Egan-Jones Ratings Co. ("EJR") and Sean Egan ("Egan") (collectively, the "EJR Defendants") and Wenrong Hu ("Dr. Hu") jointly submit this unopposed request for a modification of the summary judgment briefing schedule set forth by Your Honor's June 10, 2025 Order (ECF No. 155) to accommodate an upcoming wedding/honeymoon of EJR Defendants' counsel, two other previously-scheduled international vacations, and the Jewish High Holidays. As noted below, Defendants have coordinated with Plaintiffs' counsel and reached agreement on the proposed modified briefing schedule, subject to Your Honor's review and approval.

The impetus for the request to modify the briefing schedule is that the schedule delineated in Your Honor's June 10 Order creates a scheduling conflict with several long-planned events (about which Your Honor was not aware in issuing the schedule on June 10). For example, I will be traveling overseas on a long-planned vacation from mid-August through and including September 2, 2025, the date set forth in the June 10 Order for the filing of opening papers in support of the motion(s) for summary judgment.¹ In addition, Kyla Miller, our senior associate working on this case, is getting married in late-July and will be out of the country for one month, including almost all of August, for her honeymoon. David Deromedi, one of the lawyers for Dr. Hu, also has a previously-scheduled trip to Europe from August 17 through August 31.

We have coordinated with Plaintiffs' counsel, Adam Schuman, who requested that the revised briefing schedule not interfere with observance of the Jewish High Holidays of Rosh Hashanah and Yom Kippur, which fall in late September and early October (and which are also observed by certain of the lawyers for Defendants). We informed Mr. Schuman that we had no

¹ Dr. Hu's motion to dismiss has been fully briefed and is pending before the Court. Depending on the timing and outcome of that motion, it may or may not be necessary for Dr. Hu to file a motion for summary judgment.

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objection to accommodating Mr. Schuman's request. Counsel for all parties have agreed on the following revised schedule, subject to Your Honor's review and approval:

<u>Event</u>	<u>Current Date</u>	<u>Proposed New Date</u>	<u>Reason for Requested Extension</u>
Defendants' Opening Briefs	September 2, 2025	September 19, 2025	As described, Defendants' counsel have multiple long-planned international travel commitments and a wedding/honeymoon that create a conflict with the current deadline.
Plaintiffs' Opposition Brief	September 23, 2025	October 22, 2025	The proposed date reflects some additional days to accommodate the Jewish holidays for Plaintiffs' counsel.
Defendants' Reply Briefs	October 7, 2025	November 5, 2025	The proposed date preserves the reply period provided to Defendants by Your Honor's June 10 Order.

This is the first request by any of the parties for an extension/modification of the summary judgment briefing schedule set by the Court in the June 10 Order.

Accordingly, Defendants respectfully submit that, for the reasons set forth above, good cause exists to grant their unopposed request to modify the briefing schedule on the motion(s) for summary judgment.

Respectfully submitted,

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